**To:** Federal Communications Commission (FCC)
**Subject:** Easing barriers to support greater use and open innovation in amateur radio and digital communications
**From:** Board of Directors, Amateur Radio Digital Communications (ARDC)
**Date:** Apr 11, 2025
**Proceeding:** 25-133

# Introduction

Amateur Radio Digital Communications (ARDC) is a private foundation whose vision is to create a thriving global community of learners, experimenters, and contributors advancing freedom with open source communication and information technology. Our organization promotes the ability of individuals to innovate and freely communicate, with a key goal of getting more people involved in and using amateur radio and unlicensed spectrum. We have supported projects like the rebuild of MIT's Radome, getting K-12 students to connect with astronauts, and research on using using amateur radio data to study trans-equatorial propagation and plasma bubbles. We are also the stewards of 44Net, a block of IPv4 addresses that has connected the global amateur radio community and the Internet since the early 1980s.

It is from this perspective that we offer comments related to how FCC rules might be eased in support of our mission, as well as the wider amateur radio and networking community. Our comments have their basis in some core principles and ideas:

1. Self regulation is a key aspect of the amateur radio service, and over the past century has demonstrated its efficacy.

2. It should be as easy and reasonable as possible for amateur radio operators to obtain and maintain their license.

3. Aside from commercial content, amateur radio operators should be permitted to transmit the same kinds of content that are legally transmittable over other bands. The First Amendment right to Free Speech must apply here (and throughout FCC regulations).

4. In the decades since amateur radio has been able to send packets over the airwaves, the Internet – as well as related privacy standards – has evolved. Obscuring information for the purpose of authentication is now standard, and amateur radio rules should explicitly allow that (and similar) modern standards.

Expanding on these principles, we see opportunities to ease administrative burden on the FCC, as well as easing burdens on amateur radio licensees.

# Opportunities

## Reducing administrative burden

Amateur radio licenses are the initial (necessary) barriers to entry to joining the amateur radio service. A simple way to ease administrative burden on both the FCC and a licensee would be to:

- **Grant lifetime amateur radio licenses, or otherwise simplify the renewal process.** The current approach seems inefficient, and eliminating the license renewal requirement could reduce effort at the FCC. Modernizing FCC web portals could achieve a similar effect.

## Experience gained through implementation of the rules

Though many existing regulations and standards make sense for reasons related to safety and courteous use of the amateur radio bands – such as those related to spurious emissions and intentional interference – there are others that, at this point, feel overly restrictive and impermissible to modern technology. Given this, we propose some easing of restrictions as well as increased self-governance by the ham community in certain cases like these:

- **Remove mandatory band plans and emission restrictions (e.g. CW/Phone segments).** This allows amateur radio operators to choose the mode of communication on allocated band plans. Of course, the expectation would be for operators to continue not to cause intentional interference and not to bother non-ham services, keeping with existing standards (such as those related to spurious emissions).
    - **Remove special station classifications to the extent possible under ITU regulations,** as technology has evolved so that certain station operations can be unattended.
    - **Remove specific telecommand and remote control rules,** allowing for greater self-regulation with regards to resolving interference. This can be managed by, for example, ensuring an email address or phone number is connected to an identifier.
- **Loosen or remove as many content restrictions as possible, subject to ITU limits.** Outside of commercial content or otherwise conducting business, our stance is that: if it is legal to transmit content over unlicensed services like WiFi, it should also be transmittable on the amateur radio bands. Relatedly, we propose easing rules for incidental playing of music in the background.

### Marketplace and technological changes

In the decades since amateur radio has been able to send packets over the airwaves, the Internet – as well as related privacy standards – has evolved. In service of ensuring that amateur radio technology keeps pace, we recommend the following:

- **Clarify / make explicit that public key authentication is allowed.** Part 97.113(4) states that, aside from certain transmissions (primarily related to satellites), no messages should be "encoded for the purpose of obscuring their meaning." The current wording of the rule leaves open the opportunity for disagreement about whether public key authentication is fully allowed under this standard. Our reading is that it is – this kind of authentication is not obscuring any message, nor does it obscure the transmitter or receiver. We therefore believe Part 97 should clarify that this kind of encryption is explicitly allowed.

### Other considerations relevant to the retrospective review of Commission rules

- **Allow people to opt out of their private data (particularly home address) being publicly displayed on the FCC website.** We live in an era where the privacy of citizens (and notably their safety) is an increasing and legitimate concern. It is no wonder, then, that public display of home address is a stated reason for some people to choose not to get an amateur radio license. We propose that the FCC ease the burden on licensees by allowing them to opt-out of publicly sharing their home address, as the Federal Aviation Administration (FAA) now allows. An alternative might be to make it possible to no longer view past addresses, so that licensees may update their address to a local P.O. box or mail forwarding address without their home address still visible. We recognize that there is tension between advocating for increased self-governance and making contact information private. However, there is likely a way to resolve that tension while respecting privacy and safety concerns.

## Conclusion

As the FCC looks for opportunities to reduce regulations, there are ample opportunities to do so for amateur radio – making it easier for people get involved, maintain their license, use modern technology and protocols, and engage in open discussions. Thank you for taking the time to consider our suggestions. Please do not hesitate to reach out with any questions or needed clarifications: contact@ardc.net.